

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

BARBARA JOHNSON, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
vs.)	Case No.:
)	
GOVERNOR MICHAEL PARSON, <i>et al.</i>)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

COME NOW Plaintiffs', by and through their undersigned counsel of record, and for their Motion for Preliminary Injunction, respectfully request the following relief:

- a. The early entry of a preliminary scheduling order for purposes of this motion.
- b. An opportunity to conduct discovery and as necessary to preserve testimony.
- c. An evidentiary hearing on Plaintiffs' Motion for a Preliminary Injunction.
- d. After the hearing and any additional briefing, the entry by the Court of a

Preliminary Injunction consisting of the following:

- i. The Court's finding and holding that the Plaintiffs are likely to prevail on their claims that the adoption and maintenance of control of the Kansas City, Missouri Board of Police Commissioners (KCMBPC) the State of Missouri violates the Equal Protection rights of Plaintiffs and that Plaintiffs meet the requirements for and are entitled to the entry of a preliminary injunction.
- ii. That unless such state control of the KCMBPC is otherwise ended by December 31, 2025, as of midnight on December 31, 2025 such state

control is enjoined and the control and supervision of the KCMBPC shall then pass to and be assumed by the City of Kansas City, Missouri.

- iii. As of September 15, 2025 the City of Kansas City, Missouri is invited to intervene in this matter for the limited purpose of offering assistance in fashioning the specific details of the injunction to effect the transfer of control of the KCMBPC to the City of Kansas City, Missouri as of January 1, 2026.
- iv. On or before September 30, 2025 the parties, including any parties that have intervened, shall submit to the Court proposed specific terms of an order by this Court to effect the injunction of state control of the KCMBPC, including the identification of statutes that may need to be enjoined.
- v. The Court enters a specific preliminary injunction to take effect at midnight on December 31, 2025.
- e. And for any other and further relief the Court deems just and proper.
- f. Plaintiffs request oral argument pursuant to L.R. 7.0(e).

And for any other and further relief the Court deems just and proper.

Respectfully submitted,

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Certificate of Service

I hereby certify that on May 20, 2024, a copy of the foregoing was sent through the Federal filing system CM/ECF to the registered attorneys of record and to all others by electronic mail:

/s/ Spencer J. Webster
Spencer J. Webster